



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

November 10, 1993

Reply to
Attn of: HW-124

Ms. Alice Williams, Director
Environmental Restoration Division
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83401-1562

Re: The Track 2 Summary Report for Operable Unit 5-07, ARA-I
Sites ARA-02 and ARA-03

Dear Ms. Williams:

We have reviewed the referenced document and have considered the data and risk assessments, as well as the DOE recommendations for disposition of these two sites, in accordance with the INEL Federal Facility Agreement and Consent Order Action Plan.

The EPA agrees that these two sites have been adequately investigated and that the risk assessments have been performed correctly, accounting for the likely exposure pathways for the contaminants identified at each of the sites. The sites as they presently exist do not present an unacceptable risk to human health or the environment, and clean up under the DOE "best management practices" is appropriate. A summary of the information supporting this conclusion is attached.

It will be necessary to review both of these sites during the scoping of the WAG 5 Comprehensive Remedial Investigation in order to ensure that work completed under DOE "best management practices" has left the sites in a condition which allows for unlimited, unrestricted future use. If these sites do not meet that standard, further remedial action under CERCLA may be required.

It is expected that DOE-ID will provide IDHW and EPA with written notification when clean-up of the ARA-03 site is completed, and with a Technical Memorandum which includes validated sampling results demonstrating successful clean-up of both sites within this OU not later than 30 days after receipt of such final data for ARA-02. This Technical Memorandum will serve then as the basis for evaluating these sites during the scoping of the WAG-wide remedial investigation.

If you or your staff have any questions about our comments, please contact me at (206)553-1172.

Sincerely,



Howard R. Blood
WAG 5 Project Manager

Enclosure

cc: Talley Jenkins, DOE-ID
Thomas Stoops, IDHW-IF
Shawn Rosenberger, IDHW-IF
Dean Nygard, IDHW

cc (w/o encl): Jerry Lyle, DOE-ID
Carol Strong, RUST Geotech

ENCLOSURE

ARA-02 SANITARY WASTE LEACH FIELD AND SEEPAGE PIT

Summary

The ARA-02 site consists of a sanitary sewerage system comprised of two septic tanks (800 and 500 gal), a chlorine contact tank (500 gal), a seepage pit, and the associated piping and manhole structures, as well as any surrounding soils that may have become contaminated either as a result of discharges during operation or system leaks. The system was constructed in 1960 to service three buildings and two office trailers at the ARA I site, and was in use through 1988.

The ARA-02 site was investigated in the summer of 1992. The contents of the tanks, the residual sludge in the seepage pit, and the soils surrounding the sewerage system were sampled. The analytical results showed that a number of radionuclides (americium, cobalt, cesium, europium, plutonium strontium, and uranium) as well as several metals, volatile and semi-volatile organic compounds, and three PCBs (Aroclor-1242, -1254, and -1260) are present within the system. Some radionuclides, VOCs and SVOCs were also detected in soil samples taken outside the system, but the number, type, and concentration of contaminants detected indicate that there have not been significant past releases from the system.

Assessment

As long as the tanks remain intact, there are no exposure routes by which significant amounts of those contaminants identified within the system could reach a receptor. The proposed clean up under DOE-ID "best management practices" appears to be outside of the CERCLA process, and would therefore need to meet both the substantive and procedural aspects of all applicable State and Federal requirements.

The summary report identifies a requirement for an approved waste treatment, storage and disposal facility for the wastes contained in the tanks. Such a facility is not currently in operation at the INEL, consequently the action will be delayed for some unspecified period of time. In the interim, routine monitoring should be employed to ensure that any release from the tanks would be identified quickly.

If contents of the tanks have not been removed and properly disposed of (including the post-cleanup sampling/analyses and a report) by the time scoping of the WAG-5 Remedial Investigation begins, this site will be required to be evaluated for possible remedial action under the WAG-wide Record of Decision.

ARA-03 PAD NEAR ARA-627 (LEAD SHEETING)

Summary

This site consists of approximately 900 sf of radioactively contaminated surface soil, east of Building 627 and at the approximate former location of Office Trailer No. 1. The contamination was discovered in 1979; the original source is not known. Until January 1991, the area was covered with lead sheeting to attenuate the radiation field.

Cleanup of this site was planned as a Decontamination and Decommissioning action, and a total 12 soil samples (0-6 in. and 18-24 in. depths, at six locations) were collected and analyzed in April of 1991. Radioactive contamination was found in all but one sample, but contamination levels were significantly lower in the deeper samples. Cesium was identified in all but one sample; cobalt and europium were found in only one of the near-surface samples. The samples were also analyzed for RCRA hazardous waste characteristics and none were identified as exceeding regulatory limits.

DOE proposes to clean up this site within the next year under "best management practices", and incorporate the results into the WAG-wide RI/FS.

Assessment

The ARA-03 soils present a current unacceptable risk to site workers under the default exposure scenario, and can only be considered an acceptable risk due to the existing limitation on activities at the site. Maintaining the present "institutional controls" at this site makes the proposed cleanup within the next year under "best management practices" an acceptable option, although it would also be acceptable for DOE-ID, as lead agency, to identify this as either a time-critical or non time-critical removal action under the terms of 40 CFR 300.415. Maintaining the existing site controls until the contaminated soils are removed must be a part of the action.

If contaminated site soils have not been removed and properly disposed of (including the post-cleanup sampling/analyses and a report) by the time scoping of the WAG-5 Remedial Investigation begins, this site will be required to be evaluated for possible remedial action under the WAG-wide Record of Decision.